

EXHIBIT Y

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LINDA JANN LEWIS, MADISON LEE,
ELLEN SWEETS, BENNY ALEXANDER,
GEORGE MORGAN, VOTO LATINO,
TEXAS STATE CONFERENCE OF THE
NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE,
and TEXAS ALLIANCE FOR RETIRED
AMERICANS,

Plaintiffs,

vs.

RUTH HUGHS, in her official capacity as
Texas Secretary of State,

Defendant.

Civil Action No. 5:20-cv-00577

Related to *Gloria et al. v. Hughs et al.*,
No. 5:20-cv-00527

**DECLARATION OF BENNY ALEXANDER IN SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY INJUNCTION**

Pursuant to 20 U.S.C. § 1746, I, Benny Alexander, declare as follows:

1. My name is Benny Alexander. I am over the age of 18, have personal knowledge of the facts stated in this declaration, and can competently testify to their truth.
2. I live in San Antonio, Texas, and am a registered voter in Bexar County. I am 66 years old and the pastor of New Way Bible Fellowship Church in San Antonio. I have been at New Way Bible Fellowship for twelve years. I have been a minister for 22 years, and before becoming the pastor of New Way Bible Fellowship I was also a real estate appraiser.
3. I have always been politically and civically engaged. In 1988, I ran for state representative. Ex. A (Campaign Flyer). I was also on the Texas State Democratic Executive Committee for almost ten years, from 1997 to 2006. I represented 26 counties on the committee. Over the years, I've served on the Bexar County Housing Board, San Antonio Transit Board, San

Antonio Equal Employment Opportunity Committee, Bexar County Blue Ribbon Committee for the Sheriff's Department, and many more. I've also ran numerous local, state, and federal political campaigns.

4. Beyond these activities, I am committed to participating in elections so that my interests and the interests of the community I lead are heard. I have voted in every election since I turned 18. I have never voted by mail because as a community leader I prefer to go to the polls to engage others and show them that I am voting to lead by example. However, I suffer from congestive heart failure and diabetes, both of which put me at risk of severe complications from COVID-19. Therefore, though I prefer to vote in person, I plan to vote by mail in November 2020 because I am unwilling to expose myself to the risk of infection by waiting in long lines at Bexar County polling locations.

5. I am aware that Texas election law includes the Signature Match Requirement, which requires counties to verify a voter's signature with no instructions for county officials, and no provision of the opportunity for a voter to cure signature mismatch. I understand that this has resulted in mail-in ballots being rejected for signature mismatch reasons even though the ballot was, in fact, properly signed by the voter. I fear the same thing happening to me. As I get older and on days when my congestive heart failure has me feeling weak and lightheaded, I've noticed my handwriting and signature changes. And I understand that the signatures of even perfectly healthy people can fluctuate for no obvious reason. I fear that my mail-in ballot will be rejected for mismatching signatures despite my best effort to clearly and uniformly sign my application to vote by mail and my ballot carrier envelope.

6. I am also very concerned that I will be unable to return my marked mail-in ballot by the Ballot Receipt Deadline. I understand that the USPS is under great strain as many more

people are relying on the mail system in the pandemic. Coupled with the fact that many more people will be voting by mail this November because of the COVID-19 pandemic, there is the distinct possibility that I will not receive my mail-in ballot in time to mark it and mail it back before the Ballot Receipt Deadline.

7. I believe that besides a person's health, there are few things more important than exercising the right to vote. I do not want to have to make a choice between my health and casting as ballot. I would feel more confident that every ballot will be counted if people have more than one option for returning their mail-in ballot, including having trusted individuals collect those ballots and deliver them directly to the county election's office. Because I fear that my mail-in ballot could arrive back to the county late because of postal delays out of my control, I would feel more comfortable if I could guarantee its timely arrival by having a friend or family member drop it off at the county. However, I know that the Voter Assistance Ban makes such help a felony and I am unwilling to expose anyone to criminal liability for assisting me, even if that means my mail-in ballot arrives late and goes uncounted.

8. Because of the Signature Verification Requirement, Ballot Receipt Deadline, and Voter Assistance Ban, I think there is a significant risk that my mail-in ballot will not be counted in November's general election. I hope that the court prevents the enforcement of these laws in November so that I can vote in confidence without exposing myself to grave health risks.

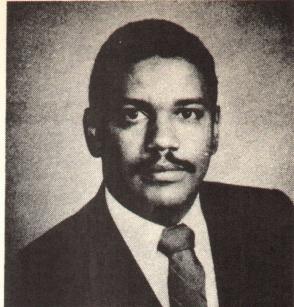
I declare under penalty of perjury that the foregoing is true and correct.

DATED: 6/15/20

By: Benny Alexander
Benny Alexander

EXHIBIT A

**LET'S WALK
TOGETHER
WITH
THE MAN!**



Ben Alexander

**WILL WALK THAT EXTRA MILE
FOR YOU AND YOUR FAMILY
TO EFFECTIVELY FIGHT**

CRIME

- Drugs • Prostitution
- Burglary • Murder, Etc.

ILLITERACY

Drop/Outs

Lack of Opportunities

Lack of Equal Facilities and Funding

UNEMPLOYMENT

Low Wages

Lack of Jobs

Poor Economic Opportunities

AND OBTAIN FOR YOU
EQUAL OPPORTUNITIES
IN ALL PHASES OF AMERICAN LIFE!

FOR A NEW LOOK IN DIST. 120

VOTE FOR

BEN ALEXANDER

THE MAN WITH THE 21st CENTURY DREAM

VOTE — SUPER TUESDAY — MARCH 8th

Pd. for by the committee to Elect Ben Alexander, David Hernandez, Treasurer